

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In re:

CITY OF DETROIT, MICHIGAN,

Debtor.

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Chapter 9

Case No. 13-53846

Hon. Steven W. Rhodes

**JOINDER OF THE MICHIGAN COUNCIL 25 OF THE AMERICAN
FEDERATION OF STATE, COUNTY & MUNICIPAL EMPLOYEES,
AFL-CIO AND SUB-CHAPTER 98, CITY OF DETROIT RETIREES IN
RESPONSES TO COURT ORDERS REGARDING (I) IDENTIFYING
LEGAL ISSUES RELATING TO CONFIRMATION AND (II)
ADJOURNED STATUS CONFERENCE**

Michigan Council 25 of the American Federation of State, County & Municipal Employees, AFL-CIO and Sub-Chapter 98, City of Detroit Retirees (collectively, “**AFSCME**”) through its counsel, hereby joins in and adopts as if set forth herein the following responses (the “**Responses**”) to the Court’s (I) *Order Regarding Identifying Legal Issues Relating to Confirmation* [Docket No. 5021] (the “**Legal Issues Order**”) and/or (II) *Order Regarding Adjourned Status Conference* [Docket No. 5020] (the “**Status Conference Order**”): (A) *Limited Response of the Detroit Retirement Systems to the Order Regarding Identifying Legal Issues Relating to Confirmation* [Docket No. 5045]; (B) *Limited Response of the Detroit Retirement Systems to the Order Regarding Adjourned Status Conference* [Docket No. 5046]; and (C) *Response to Order Requiring*

Identification of Legal Issues Relating to Confirmation [Docket No. 5050] filed by the Official Committee of Retirees of the City of Detroit, Michigan, the Retired Detroit Police & Fire Fighters Association (“**RDPFFA**”), Donald Taylor, individually and as President of the RDPFFA, the Detroit Retired City Employees Association (“**DRCEA**”), and Shirley V. Lightsey, individually and as President of the DRCEA. AFSCME further respectfully states as follows:

1. On May 9, 2014, the Court entered the *Order Approving the Stipulation Modifying Certain Deadlines Established in the Fourth Amended Order Establishing Procedures, Deadlines and Hearing Dates Relating to the Debtors’ Plan of Adjustment* [Docket No. 4587] (the “**Modification Order**”).

2. Pursuant to the Modification Order, the Court extended the deadline for AFSCME and other retiree parties to object to the City’s plan of adjustment (the “**Plan**”) to, at the earliest, June 22, 2014 (or later, assuming the funding commitments from the State of Michigan and DIA settlement parties are made by June 20, 2014).

3. Accordingly, AFSCME has not yet filed or served Plan objections, and AFSCME believes it is not currently an “objecting party” subject to the Legal Issues Order or Status Conference Order.

4. Nevertheless, AFSCME reserves all rights to (i) object to the Plan on any and all grounds within the timeframe of the Modification Order; (ii) identify

potential legal issues to be decided at confirmation without evidence; and (iii) object to the proposed treatment of any issue as a legal and/or factual issue.

Dated: May 27, 2014

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CERTIFICATE OF SERVICE

The undersigned certifies that on May 27, 2014, the foregoing document was filed with the Clerk of the Court using the CM/ECF system, which provides electronic notification of such filing to all counsel of record.

Dated: May 27, 2014

/s/ Philip J. Gross

Philip J. Gross

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